

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2018 OCT -4 PM 4:55

CLERK
BY  DEPUTY CLERK

UNITED STATES OF AMERICA

v.

RICHARD TRUDEAU,
JULIE HURST, and
LUIS RODRIGUEZ
Defendants.

Crim. No.

5:18-cr-118-1-2-3

INDICTMENT

The Grand Jury Charges:

COUNT ONE

In or about and between June 2018 and September 2018, both dates being approximate and inclusive, in the District of Vermont and elsewhere, the defendants RICHARD TRUDEAU, JULIE HURST, and LUIS RODRIGUEZ knowingly and willfully conspired together and with others to distribute heroin, a Schedule I controlled substance.

The conduct of the defendants RICHARD TRUDEAU, JULIE HURST, and LUIS RODRIGUEZ as members of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams or more of heroin.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(i))

COUNT TWO

On or about September 6, 2018, in the District of Vermont and elsewhere, the defendants RICHARD TRUDEAU, JULIE HURST, and LUIS RODRIGUEZ knowingly and intentionally possessed with intent to distribute heroin, a Schedule I controlled substance, and 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(B); 18 U.S.C. § 2)

COUNT THREE

On or about September 13, 2018, in the District of Vermont and elsewhere, the defendant LUIS RODRIGUEZ knowingly and intentionally attempted to aid and abet another person to possess with intent to distribute 100 grams or more of heroin, a Schedule I controlled substance, and 40 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi); 18 U.S.C. § 2)

FORFEITURE NOTICE

1. The allegations contained in Counts One through Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 846 or 841(a)(1), the defendants, RICHARD TRUDEAU, JULIE HURST, and LUIS RODRIGUEZ, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

- (a) approximately \$6,672 in U.S. currency that was seized on September 13, 2018, at the defendant LUIS RODRIGUEZ's residence.

3. If any forfeitable property described above, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

(21 U.S.C. § 853)

A TRUE BILL



FOREPERSON

Christina E. Nolan
CHRISTINA E. NOLAN (ACG)
United States Attorney
Burlington, Vermont
September 27, 2018